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October 1, 2021

Via ECF

Honorable Ona T. Wang
United States Magistrate Judge
U.S. District Court Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *BSG Resources Guinea Limited et al. (BSGR) v. George Soros et al.*, No. 1:17-cv-02726 (JFK) (OTW)

Dear Judge Wang:

We are co-counsel for Plaintiffs and write at the direction of our client in accordance with the Court's September 10 order (ECF 300) (the "September 10 Order") and the Court's direction from the September 9 conference to submit an individual status letter if the case is not dismissed by October 1.

In the September 10 Order, the Court briefly stayed this action until October 1. Plaintiffs respectfully request that this stay be extended for 14 more days until October 15, 2021. The reason for the request is that the Joint Administrators have informed us that they have reached a decision to try to amicably dispose of this case in the near term. However, there are steps that need to be taken prior to any finalization and actualization of that decision. These include conferring with the relevant BSGR stakeholders and discussions with Defendants. There just has not been enough time to do all of that since the last conference. Since the September 9 conference, the Joint Administrators continued to confer with potential litigation funders and sources. Thereafter, they have been seeking to finalize the necessary process for conferring with relevant BSGR stakeholders. This was and is a process that the Joint Administrators must go through. The additional 14 days would provide Plaintiffs with an opportunity to engage in this process without the burdens and costs associated with lifting the stay now.

It is important to note that, as the Joint Administrators have previously explained to the Court (ECF 236 & 252-4), the Joint Administrators are in this position because they no longer have any source of funding for this litigation. The lack of funding is not the fault of the Joint Administrators. Given that, and the process which Plaintiffs are engaged in, Plaintiffs should not be penalized by having to incur additional expenses (if no additional stay is ordered) that likely will not be necessary simply because of circumstances beyond their control. They should be permitted the necessary relatively brief additional time to work through these issues. A stay will also conserve resources of the Court and Defendants. Plaintiffs discussed this proposal with Defendants' counsel this afternoon. Defendants' counsel indicated they needed more time and information to consider this proposal. Thus, Plaintiffs respectfully request an extension of the stay for an additional 14 days.

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Finally, we also wish to inform the Court that the agreed-upon new date for Mr. Cramer's deposition is November 18, 2021.

Respectfully,

A handwritten signature in blue ink, appearing to read "Louis M. Solomon".

Louis M. Solomon

cc: Counsel of Record (via ECF)